

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Richmond Division**

IN RE:	)	
	)	
FORREST ANDRE PARKER SR.	)	Case No. 21-31527-KRH
	)	Chapter 13
Debtor	)	

**MOTION TO EXPEDITE HEARING ON MOTION  
TO SELL REAL ESTATE AND TO SHORTEN NOTICE PERIOD**

COME NOW the Debtor, by counsel, and move this Court to Expedite the Hearing on his Motion to Sell Real Estate and to Shorten Notice Period, and in support thereof states as follows:

1. The Debtor filed this case under Chapter 13 of the U.S. Bankruptcy Code on May 7, 2021.
2. Statebridge Company LLC (“Statebridge”) is a secured creditor which holds a first mortgage on the property known as 26640 Laurel Grove Court, Mechanicsville, MD 20659, more particularly known as  
  
Being known and designated Lot Numbered Twenty-Six (26), containing 2.24 acres, more or less, as shown on plat entitled “Laurel Grove Estates” and recorded among the Plat Records of St. Mary’s County, Maryland at Liber No. 34 and Folio 101 and recorded at Liber No. 24, folio 119. The improvements thereon being known as 26640 Laurel Grove Estates, Mechanicsville, Maryland 20659.  
  
(the “Property”).
3. The approximate payoff balance on the note secured by said mortgage is \$311,085.00. The tax assessed value of the Property is \$277,167.00.

James E. Kane (VSB #30081)  
KANE & PAPA, P.C.  
1313 East Cary Street  
Richmond, VA 23219  
(804) 225-9500 (phone)  
(804) 225-9598 (fax)  
*Counsel for Debtor*

4. Statebridge has agreed to short sale the Property for \$282,000.00 to Diane Parker, a relative of the Debtors, which, upon closing of the same, will result in Statebridge releasing its deed of trust against the Property. A copy of said Agreement is attached hereto collectively as Exhibit "A" and incorporated herein by this reference.

5. On May 31, 2021, or as soon thereafter as may be practicable, Debtor intends to sell his home interest in the Property in accordance with the terms of the Agreement.

6. No proceeds from the sale will be distributed to the Debtor.

WHEREFORE, the Debtors respectfully request that the Court expedite the hearing on their Motion to Pursuant to Rule 6004 for Proposed Sale of Real Estate, Shorten the Notice Period required for said Motion, and grant them such other and further relief as is just and proper.

Dated: May 21, 2021

FORREST ANDRE PARKER SR.

By: /s/ James E. Kane  
Counsel

James E. Kane (VSB #30081)  
KANE & PAPA, P.C.  
1313 East Cary Street  
Richmond, VA 23219  
(804) 225-9500 (phone)  
(804) 225-9598 (fax)  
*Counsel for Debtor*

**CERTIFICATION**

I, James E. Kane, pursuant to Local Rule 9013-1(N), do hereby certify that:

1. I have carefully examined the matter and concluded that there is a true need for an emergency hearing,
2. I have not created the emergency through any lack of due diligence.
3. I have made a *bona fide* effort to resolve the matter without hearing.

By: /s/ James E. Kane  
James E. Kane

**CERTIFICATE OF SERVICE**

I hereby certify that on May 21, 2021, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to all parties registered to receive notice thereof and will mail the same by first class mail, postage pre-paid, to the parties on the attached list.

/s/ James E. Kane  
Counsel for Debtor

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA**  
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IN RE:	)	
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	)	Chapter 13
Debtor	)	

**NOTICE OF MOTION AND HEARING**

The above Debtor has filed papers with the Court to request an order to Expedite the hearing and to Shorten the Notice Period with respect to his Motion to Sell Real Estate.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

If you do not want the court to grant the relief sought in the motion, or if you want the court to consider your views on the motion, then, you or your attorney must:

- File with the court, at the address shown below, a written request for a hearing [or written response pursuant to Local Bankruptcy Rule 9013-1(H)]. If you mail your request for a hearing (or response) to the court for filing, you must mail it early enough so the court will receive it on or before the date stated above, to:

Clerk of Court  
United States Bankruptcy Court  
701 East Broad Street  
Richmond, VA 23219

You must also mail a copy to:

James E. Kane, Esquire  
KANE & PAPA, P.C.  
1313 East Cary Street  
Richmond, Virginia 23219

- Attend a hearing scheduled for **May 26, 2021 at 12:00 p.m. at U.S. Bankruptcy Court, 701 East Broad Street, Room 5000, Richmond, VA 23219.** If no timely response has been filed opposing the relief requested, the court may grant the relief without holding a hearing.

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the motion or objection and may enter an order granting that relief.

Dated: May 21, 2021

FORREST ANDRE PARKER SR

By: /s/ James E. Kane  
Counsel

James E. Kane (VSB #30081)  
KANE & PAPA, P.C.  
1313 East Cary Street  
Richmond, VA 23219  
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/s/ James E. Kane  
Counsel for Debtor

Label Matrix for local noticing

0422-3

Case 21-31527-KRH

Eastern District of Virginia

Richmond

Fri May 21 11:18:47 EDT 2021

Ashley Funding Services

P. O. Box 10587

Greenville, SC 29603-0587

Lee's Hill Community Association, Inc.

MercerTrigiani LLP

112 South Alfred Street

Alexandria, VA 22314-3061

BB&amp;T/Truist

Attn: Bankruptcy

Po Box 1847

Wilson, NC 27894-1847

United States Bankruptcy Court

701 East Broad Street

Richmond, VA 23219-1888

Bsi Financial Services

Attn: Bankruptcy

P.O Box 517

Titusville, PA 16354-0517

Chase Mortgage

Chase Records Center/Attn: Correspondenc

Mail Code LA4 5555 700 Kansas Ln

Monroe, LA 71203-0000

DEPARTMENT OF THE TREASURY-IRS

INTERNAL REVENUE SERVICE

PO BOX 7346

PHILADELPHIA, PA 19101-7346

Diane Parker

26640 Laurel Grove Court

Mechanicsville, MD 20659-4472

Division of Child Support

730 E. Broad Street, 4th Floor

Richmond, VA 23219-1861

Internal Revenue Service

Centralized Insolvency Operati

P. O. Box 7346

Philadelphia, PA 19101-7346

Lee's Hill Community Assoc.

9901 Old Dominion Pkwy

Fredericksburg, VA 22408-9570

MercerTrigiani

112 S Alfred St.

Alexandria, VA 22314-3061

Omega Exterior Restoration Inc

25686 Grandiflora Ct

Mechanicsville, MD 20659-4921

Retina Institute of VA

8700 Stony Point Pkwy

Suite 150

Richmond, VA 23235-1963

Robertson, Anschutz, Schneid,

11900 Parklawn Drive

Suite 310

Rockville, MD 20852-2893

TACS

P O Box 31800

Henrico, VA 23294-1800

US Attorney

Suntrust Building

919 East Main Street, Suite 1900

Richmond, VA 23219-4622

VA Dept. of Taxation

Office of Customer Services

PO Box 1115

Richmond, VA 23218-1115

Virginia Credit Union

Attn: Bankruptcy

Po Box 90010

Richmond, VA 23225-9010

Forrest Andre Parker Sr.

9811 Fendale Lane

Fredericksburg, VA 22408-9529

James E. Kane

Kane &amp; Papa, PC

1313 East Cary Street

P.O. Box 508

Richmond, VA 23218-0508

John P. Fitzgerald, III

Office of the US Trustee - Region 4 -R

701 E. Broad Street, Ste. 4304

Richmond, VA 23219-1849

Suzanne E. Wade

341 Dial 877-996-8484 Code 2385911

7202 Glen Forest Drive, Ste. 202

Richmond, VA 23226-3770

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(u)JPMorgan Chase Bank, National Association

(u)Personal property taxes??

End of Label Matrix

Mailable recipients 23

Bypassed recipients 2

Total 25